

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS NORRIS,)	
)	
Plaintiff,)	07 C 6776
)	
v.)	
)	Judge Guzman
CITY OF CHICAGO,)	
)	Magistrate Judge Ashman
Defendant.)	

**CITY OF CHICAGO’S AGREED MOTION TO
EXTEND THE TIME IN WHICH TO ANSWER OR OTHERWISE
PLEAD TO PLAINTIFF FIRST AMENDED COMPLAINT AT LAW**

Defendant City of Chicago (“City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Honorable Court grant an extension of time up to and including April 30, 2008 in which to answer or otherwise plead to Plaintiff’s First Amended Complaint at Law. In support of this agreed motion, the City states as follows:

1. Plaintiff initially filed this lawsuit against the City of Chicago, Department of Aviation and Ms. Jan Arnold, former Chief Administrative Officer with the Department of Aviation, alleging state law claims and claims brought pursuant to 42 U.C.S. § 1983 alleging violations of Plaintiff’s constitutional rights based on Plaintiff’s failure to be promoted to Safety Director at Midway Airport.

2. Counsel for Defendants City and Jan Arnold filed a Motion to Dismiss Plaintiff’s Complaint at Law on March 10, 2008. Based on the Motion to Dismiss, Plaintiff amended his Complaint at Law, filing his First Amended Complaint on March 27, 2008. The City is the sole defendant listed in this First Amended Complaint.

3. Undersigned counsel avers that they will need additional time to answer or

otherwise plead to Plaintiff's First Amended Complaint, which is comprised of 25 pages and contains new allegations brought pursuant to the *Shakman* Decree.¹

4. Undersigned counsel has conferred with Plaintiff's counsel, Mr. Martin M. Stack, who has no objection to this request.

5. This motion is the City's first request for an extension of time to answer or otherwise plead to Plaintiff's First Amended Complaint; undersigned counsel respectfully submits that such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given until April 30, 2008 to answer or otherwise plead to Plaintiff's First Amended Complaint at Law.

Respectfully submitted,

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¹See Plaintiff's First Amended Complaint, ¶ 89: "This is a civil action brought to enforce the mandate of the adjudicated case *Shakman v. Democratic Party of Cook County*, No. 69 C 2145 (hereinafter 'Shakman Decree' or 'Shakman')."